



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

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August 12, 1999

Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Re: File No. NSD-L-99-55, Petition of the Public Utility Commission of Texas for Expedited Decision for Delegation of Authority to Implement Number Conservation Measures and CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

Enclosed please find one original and four copies of the Connecticut Department of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

A handwritten signature in cursive script, reading "Louise Rickard".

Louise Rickard  
Acting Executive Secretary

Enc.

cc: Al McCloud

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	File No.
Petition of the Public Utility Commission of Texas	)	NSD-L-99-55
for Expedited Decision for Authority to Implement	)	
Number Conservation Measures	)	
Implementation of the Local Competition Provisions	)	CC Docket No.
of the Telecommunications Act of 1996	)	96-98

COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Public Utility Commission of Texas (PUCT) Petition for Expedited Decision for Authority to Implement Number Conservation Measures (Petition). Specifically, PUCT requests authority to implement the following number conservation measures in Texas: (1) Thousands Block Number Pooling; (2) Unassigned Number Porting (UNP); (3) Reclamation of Unused NXX codes and number blocks; (4) Requiring all code holders to provide to the Texas Commission utilization and forecast information; and (5) Sequential numbering enforcement authority. Petition, p. 10.

## II. Discussion

On July 2, 1999, PUCT petitioned the Commission requesting that it be provided the authority to implement various area code conservation measures in the State of Texas. PUCT requests this authority to ensure that the public interest is protected against the ordeal of unwarranted area code relief. Petition, p. 1. CTDPUC notes that PUCT has petitioned the Commission for additional relief only after it has implemented a series of other NXX code conservation measures that include rate center consolidation, NXX code give-backs, expanded local calling area for wireless and sequential number assignments. Petition, pp. 4-6.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. PUCT has requested Commission authority to implement various area code conservation measures that it believes will address the state's existing number crisis. PUCT in support of its Petition has provided overwhelming evidence demonstrating the inefficient use of NXX codes. For example, PUCT states that Texas has added eleven new area codes since 1990 and within the seven designated metropolitan areas in that state, six have undergone area code relief one or more times within the past 10 years. Petition, p. 2. In the opinion of CTDPUC, the Commission has not delegated sufficient authority to the states to effectively address number shortages. Approval of the Petition should

provide PUCT with the ability to implement conservation measures and perhaps delay the introduction of new area codes.

Additionally, PUCT has requested that it be delegated the authority to implement several conservation measures that seek to address the telephone number crisis in Texas. The Petition should be approved because PUCT is in a better position to determine what is in the best interest of Texas. CTDPUC believes that these proposals when collectively implemented, should provide an orderly approach to alleviating the current telephone number crisis in Texas. CTDPUC notes that a number of PUCT's proposed conservation measures have been adopted and are in use in other jurisdictions. For example, PUCT has requested that the Commission delegate authority to implement mandatory thousand block number pooling. Petition, p. 10. Authority to implement mandatory thousand block number pooling has already been delegated to Illinois. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. Mandatory thousand block number pooling would provide for a more efficient use of telephone numbers and minimize the wasteful allocation of these limited resources. CTDPUC also supports PUCT's request for authority to conduct unassigned number porting. Based on CTDPUC's understanding, UNP has already been used by certain carriers during a rationing plan. Since these measures have already been approved and implemented in various jurisdictions, PUCT should be afforded the same opportunity to implement these measures as was afforded in those jurisdictions.

PUCT also requests authority to require the reclamation of unused NXX codes and thousand number blocks. Petition, p. 10. The ability to reclaim unused codes would extend the lives of current NPAs by returning to the administrator, codes that could be used by other carriers. Clearly, Texas consumers would benefit from a more efficient distribution of NXX codes that the reclamation of numbers would offer rather than the resulting cost and confusion that the continual introduction of new NPAs would create. Therefore, the PUCT request for the additional authority to reclaim unused thousand number blocks should be approved.

PUCT further requests authority to require all code holders to provide to the commission utilization and forecast information. Petition, p. 10. PUCT should be granted this authority because the provision of this before additional codes are assigned would most likely force a carrier to delay requesting codes until they are absolutely necessary. Additionally, the use of utilization and forecast information are excellent starting points to ensure that numbers are being assigned in an efficient manner. These measures alone should minimize the occurrence of code holders possessing excess number reserves.

Lastly, CTDPUUC supports PUCT's request for sequential numbering enforcement. Petition, p. 10. Given the need for numbers and surplus of previously assigned numbers, adoption of any measures that would slow down the manner in which numbers are requested and assigned should minimize the occurrence of code holders possessing excess number reserves. PUCT has in

the opinion of CTDPU, presented a logical and solid reasoning supporting these measures and therefore, they should be approved.

### III. Conclusion

PUCT has offered the Commission several area code conservation measures, that if adopted as proposed, would provide PUCT with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide PUCT with the flexibility to implement a number of conservation measures and provide it with the ability to impose stricter

requirements on those seeking codes mandating a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC  
UTILITY CONTROL

Donald W. Downes  
Chairman

Glenn Arthur  
Vice-Chairman

Jack R. Goldberg  
Commissioner

John W. Betkoski, III  
Commissioner

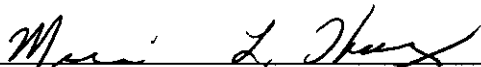
Linda Kelly Arnold  
Commissioner

August 12, 1999

Connecticut Department of  
Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051



## CERTIFICATION

  
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Miriam L. Theroux  
Commissioner of the Superior Court